

## **EXHIBIT 4**

**From:** [Hill, Rick](#)  
**To:** [Cathy Huff](#); [Tedra Cannella](#); [Robert Snyder](#); [Devin Mashman](#); [Hannah Drosky Amanuel](#)  
**Cc:** [Ferguson, Lindsay Gatling](#); [Chausmer, Aaron](#)  
**Subject:** RE: STATUTORY ELECTRONIC SERVICE -- Santana Bryson, et al. v. Rough Country  
**Date:** Friday, January 19, 2024 4:54:08 PM  
**Attachments:** [image001.png](#)  
[rev\\_25years.sig\\_526805bb-2289-415b-b3ea-50670788be0a.png](#)

---

Tedra,

Good afternoon. In reviewing Mr. Buchner's file material, it appears he did not produce his entire HVE file. It is my understanding that an HVE simulation is going to generate an HVE "case file" that contains the following data/reports: Accident History, Damage Data, Damage Studio, Driver Controls, Environment Data, Event Data, Messages, Program Data, References, Variable Output, and Vehicle Data. The only reports I can find from Mr. Buchner's production is the Accident History (Bates 3988) and Damage Data (Bates 3987). If I am mistaken and this information has been produced, if you could point me to the appropriate Bates numbers I would appreciate it. I also understand that there should be geometry files and environmental images (if used).

Please produce the entire HVE case file in digital format, to include the above missing reports/data, plus the geometry files if not contained within the HVE case file, immediately so that we have all HVE data related to Mr. Buchner's work in this case prior to his deposition.

Thanks,  
Rick



Richard H. Hill, II, Attorney

**Weinberg Wheeler Hudgins Gunn & Dial**

3344 Peachtree Road NE | Suite 2400 | Atlanta, GA 30326

D: 404.832.9534 | F: 404.875.9433

[www.wwhgd.com](http://www.wwhgd.com) | vCard

**From:** Cathy Huff <cathy@cannellasnyder.com>

**Sent:** Friday, January 19, 2024 11:19 AM

**To:** Hill, Rick <RHill@wwhgd.com>; Ferguson, Lindsay Gatling <LGatling@wwhgd.com>; Murray,

Claire C. <CMurray@wwhgd.com>; Chausmer, Aaron <AChausmer@wwhgd.com>; Greenslit, Kristin <kgreenslit@wwhgd.com>; Deubel, Emily G. <edeubel@wwhgd.com>; Lerch, Connie W. <CLerch@wwhgd.com>; Smith, LaDonna D. <LSmith@wwhgd.com>; Flynn, Monica P. <MFlynn@wwhgd.com>

**Cc:** Tedra Cannella <tedra@cannellasnyder.com>; Robert Snyder <rob@cannellasnyder.com>; Devin Mashman <devin@cannellasnyder.com>; Hannah Drosky Amanuel <hannah@cannellasnyder.com>

**Subject:** STATUTORY ELECTRONIC SERVICE -- Santana Bryson, et al. v. Rough Country

**This Message originated outside your organization.**

---

**Re:** *Santana Bryson, et al. v. Rough Country, LLC*, United States District Court for the Northern District of Georgia, Gainesville Division, Civil Action No. 2:22-cv-17-RWS

Dear Counsel:

Attached are statutory electronic service copies of the following:

1. Plaintiffs' Objections and Responses to Rough Country, LLC's Second Amended Notice of Taking Videotaped Deposition Duces Tecum of G. Bryant Buchner, P.E.
2. Plaintiffs' Objections and Responses to Rough Country, LLC's First Amended Notice of Taking Videotaped Deposition Duces Tecum of Christopher D. Roche
3. Plaintiffs' Objections and Responses to Rough Country, LLC's Second Amended Notice of Taking Videotaped Deposition Duces Tecum of Paul Lewis, Jr., M.S., BME
4. Rule 5.4 Certificate of Serving Discovery

Best regards,



**Cathy Huff**

Paralegal

**Phone:** 404.800.4828

**Email:** [cathy@cannellasnyder.com](mailto:cathy@cannellasnyder.com)

315 W. Ponce de Leon Ave.  
Suite 885  
Decatur, GA 30030

[www.cannellasnyder.com](http://www.cannellasnyder.com)

The information contained in this message may contain privileged client confidential information. If you have received this message in error, please delete it and any copies immediately.